

**Robert Hamilton**  
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**Attorney for Defendant**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Case No. 3:24-cr-00093-HZ-2**

**Plaintiff,**

**v.**

**NATHANIEL CHENEY,**

**DECLARATION OF COUNSEL IN  
SUPPORT OF UNOPPOSED  
MOTION TO CONTINUE  
TRIAL DATE**

**Defendant.**

I, Robert Hamilton, declare:

1. I am the attorney appointed to represent Nathaniel Cheney, in the above-entitled case.

2. A jury trial in this case is currently scheduled for May 21, 2024.

Mr. Cheney was arraigned on April 10, 2024. No continuances have been sought by the defense.

3. Mr. Cheney has received discovery, and the defense is conducting investigation in his case, including obtaining information relating to circumstances of the offense and Mr. Cheney's background. This information relates to pretrial litigation, trial, and sentencing. Mr. Cheney therefore respectfully requests that this Court continue his case for a period of approximately 90 days or more to accomplish these tasks.

4. I have discussed with Mr. Cheney his right to a speedy trial. He agrees to the continuance and knows it will result in excludable delay under the provisions of 18 U.S.C. § 3161(h)(7)(A) of the Speedy Trial Act.

5. Assistant United States Attorney Parakram Singh has no objection to this motion.

6. I make this motion in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on May 3, 2024, in Portland, Oregon.

/s/ Robert Hamilton  
Robert Hamilton  
Assistant Federal Public Defender